

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

MARITZA ORTIZ (PRO-SE)
Plaintiff

v.

MARÍA DEL MAR TORRES SURIA
ANA LÓPEZ PRIETO
ARVIA RAMÍREZ TORRES
HARRY MASSANET-PASTRANA
ELBA L. MARTÍNEZ-TORRES
DELMARIE VEGA LUGO
MARISOL JUSTINIANO-ALDEBOL(OSSO-
O.C.A.)
SILVIA BULA-BULA (ASUME)

Defendants

CIVIL NO.18-CV-1587 (ADC)

CIVIL RIGHTS VIOLATIONS,
A.D.A., RECOVERY OF DEFULTED
CHILD SUPPORT ARREARS NOT
FULFILLING FEDERAL
REGULATIONS, EMOTIONAL
EXTORTION, ABUSE OF POWER,
FRAUD, DEFAMATION, MEDICAL
MALPRACTICE AND NEGLIGENCE
PURSUANT TO ART. 1802 AND
1803, 31 P.R.LAWS ANN. § 5141
AND 5142 - INJUNCTIVE RELIEF
AND MANDAMUSES

JURY TRIAL DEMANDED

RESPONSE TO ORDER TO SHOW CAUSE

TO THE HONORABLE COURT:

COMES NOW the Plaintiff, MARITZA ORTIZ (hereinafter referred to as "Plaintiff"), PRO SE, and respectfully alleges and prays as follows¹:

¹ "Pattern in Court Licensed Abuse Cases...World-Wide Pattern Followed in Court Licensed Abuse Cases...Child discloses abuse, often sexual abuse:1) Law enforcement does substandard investigation, says there is not enough evidence to give to D.A. Child Protective Services does a substandard investigation, labels it unsubstantiated and shunts it into family court as a custody case.2) Judge appoints insider children's attorney and/or psychologists to shift blame to the mother by fraudulently reporting that she is a liar/alienator and/or mentally ill and recommend custody to the father, who they opine is the "friendly parent". 3) Judge minimizes, disregards and conceals evidence of abuse, finds the mother to be lying/alienating or mentally ill and gives

1. On **August 24, 2018**, this Honorable Court ordered the following:

"Plaintiff is hereby ordered to show cause as to how this court has jurisdiction over this case. And, if the Court does have jurisdiction, plaintiff is ordered to show cause as to whether and which claims are not barred by principles of res judicata. Plaintiff has ten days from the date of this order to comply. Failure to comply will result in dismissal with prejudice of plaintiff's complaint. Signed by U.S. District Judge Aida M. Delgado-Colon on 8/24/2018."

2. Rule 6 of the Federal Rules of Civil Procedures establishes that:

"... Computing Time... (1) Period Stated in Days ... When the period is stated in days ... (B) count every day, ...and legal holidays; and (C) include the last day of the period, but if the last day is...legal holiday, the period continues to run until the end of the next day that is not a...legal holiday... (4) Last Day Defined.

custody to the abusive father. 4) Judge isolates children from the mother and anyone who might support the truth about the abuse while they are Stockholmed and brainwashed by the abuser, a "reunification/deprogramming" therapist or an out-of-state camp into forgetting about or recanting the abuse and agreeing to live with the abusive father.5) Judge places mother on supervised visitation where neither she nor the children are allowed to speak of abuse, past or present. Supervision monitors report to the court if either speaks of the abuse and end the visits if they do.6) Judge makes orders that prohibit children from seeing professionals who may support their disclosures, prohibits mother from taking children to doctors or therapists, and gives the perpetrator control over who they see. 7) Judge gag orders the mother so the public cannot hear about the abuse or the court cover up of abuse and threatens that she will not see her children again if she does not remain silent and go along with the cover up. 8) Judge disempowers the mother by bankrupting her through the legal process and traumatizing her through separation from her children and enabling the abuse to continue...", <http://www.safekidsinternational.org/>.

Unless a different time is set by a statute, local rule, or court order, the last day ends: (A) for electronic filing, at midnight in the court's time zone;..."Legal Holiday" Defined. "Legal holiday" means: (A) the day set aside by statute for observing ...Labor Day...", Rule 6, F.R.C.P. (2017).

3. In response to the above stated order, along with the instructions provided by Rule 6 of the F.R.C.P.(2017), we respond with the following:
4. In Gully v. First National Bank, 299 U.S. 109 (1936), the Court held that in order to plead a federal question, the plaintiff's must assert a cause of action that implicates a right conferred by the Constitution or federal law, and that component must affect the claim to the extent that the outcome of the suit rests on the construction given to the Constitutional provision or federal law.
5. Very similarly, the Court in Franchise Tax Board v. Construction Laborers Vacation Trust, 463 U.S. 1 (1983), held that "*a federal question exists where federal law creates the cause of action, or the plaintiff's right to relief necessarily depends on resolution of a substantial question of federal law.*"
6. A concise rule of law arising from these cases is that a court has federal question jurisdiction when the action is constitutionally grounded or a federal statute provides a cause of action and a remedy.

7. Unlike when entering the federal court with jurisdiction based on diversity, there is no requirement that complete diversity exist or that the damages in a federal question civil claim exceed any particular amount of damages.
8. Congress has codified the subject matter jurisdiction authorizing federal district courts to hear "*all civil actions arising under the Constitutions' law or treaties of the United States.*", 28 U.S.C § 1331. Under our dual judicial system of state and federal courts, a state court may not refuse to hear a claim arising under another state's laws or arising under federal law. Such refusal would violate the Full Faith and Credit Clause of the U.S. Constitution. Thus, federal civil rights claims under 42 U.S.C. § 1983 may properly be commenced in federal court, specially when it comes to lawsuits against O.C.A..
9. The underlying rationale is to provide plaintiffs with a forum within which to litigate claims without fear of local state court prejudice. We must implore this court to see this case so that it will shield Plaintiff from local prejudice².

²It requires the intervention of this Federal Court because the Commonwealth Court System is incapable of providing Plaintiff with an adequate remedy at law. No adequate remedy can be obtained in the Commonwealth Courts because this case puts the Plaintiff squarely against the Administration of the Commonwealth Judiciary. The majority of the defendant(s) work under the supervision of the Administrative Director of the O.C.A., which in turn administers the Commonwealth Judiciary. Their actions complained of herein with respect to the Plaintiff, taken under

CLAIM TO COLLECT MONEY

10. The purpose of this claim is to collect arrears owed to the Plaintiff due to the non-waivable debt that is currently being erased in violation of the federal law called "*Requirement of statutorily prescribed procedures to improve effectiveness of child support enforcement*", which is codified under 42 U.S.C. § 666 and says:

"In order to satisfy section 654(20) (A) of this title, each State MUST have in effect laws requiring the use of the following procedures, consistent with this section and with regulations of the Secretary, to increase the effectiveness of the program which the State administers under this part... (2) Expedited administrative and judicial procedures (including the procedures specified in subsection © of this section) for... establishing, modifying, and enforcing support obligations... (3) Procedures under which the State child support enforcement agency shall request, and the State shall provide, that for the purpose of enforcing a support order under any State plan approved under this part- (A) any refund of State income tax which would otherwise be payable to a non-custodial parent will be reduced..."

color of state law, are so stunningly arbitrary and capricious that they are depriving and will deprive Plaintiff of her interests protected by the U.S. Constitution unless this Court intervenes. Because of the O.C.A.'s overreaching role as supervisor, administrator and evaluator of the Commonwealth Judicial System, the courts of Puerto Rico are imbued with a degree of institutional bias that renders them incapable of impartially adjudicating the Plaintiff's claims. Moreover, the Commonwealth Appeals' and Supreme Courts have already publicly, repeatedly and openly prejudged the fundamental facts at the heart of this case. For these and other reasons more fully set forth in this complaint, it is only in this Court that the Plaintiff can be assured that its dispute with the Administration of the Commonwealth Judiciary will be fairly and impartially adjudicated, in accordance with the most fundamental principles of due process of law.

shall be distributed in accordance with section 657 of this title in the case of overdue support assigned to a State pursuant to section 608(a)(3) or 671(a)(17) of this title...distributed after deduction of any fees imposed by the State to cover the costs of collection, to the child or parent to whom such support is owed...(7) Reporting arrearage to credit bureaus...(8) (A) Procedures under which all child support orders not described in subparagraph(B) will include provision for withholding from income, in order to assure that withholding as a means of collecting child support is available if arrearage occur without the necessity of filing application for services under this part...orders which are initially issued in the State on or after January 1, 1994, and are not being enforced under this part will include the following requirements:...require that any payment or installment of support under any child support order, whether...through the expedited processes...© not subject to retroactive modification by such State or by any other State...(9) Procedures which require that any payment ...under any child support order...through the expedited processes required by paragraph (2) is on and after the date it is due...© not subject to retroactive modification by such State or by any other State except that such procedure may permit modification...but only from the date that notice of such petition has been given, either directly or through the appropriate agent, to the obligee or (where the obligee is the petitioner) to the obligor...(B) Proof of substantial change in circumstances necessary in request for review outside 3-year cycle...the State shall review and if the requesting party demonstrates a substantial change...adjust the order in accordance with the guidelines established pursuant to section 667(a) of this title...", Title 42, The Public Health and Welfare § 666 (a)(10)(B).

11. We see no difference having this court, like it is done on a daily basis by all federal bankruptcy courts throughout our nation, solve our request to protect the Plaintiff's rights, the same way federal laws protect any other creditor's rights, on a daily basis, for the exact and most important debt there is: child support arrears.

12. A child support is a claim that cannot even be discharged under a Chapter 7, nor a Chapter 13 bankruptcy case, and we truly believe no court should condone discharging it.
13. If under Chapter 13, the child support claim must be paid in full as a priority debt, when child support is owed directly to a Plaintiff like the undersigned. We see no difference in enforcing the same, right now, under this other federal case. In summary, since child support claims are not dischargeable in bankruptcy cases, Why would anyone assume this is not a cause of action arising under the protections established by the specific federal law quoted above?
14. From our point of view, this case pertains to the collection of money that for us, is now owed by private citizens (defendant Ramirez, Vega, Martinez and Bula). They are now liable for it, because they either erased or are erasing, reimbursed or are reimbursing, or discharged or are discharging no less than \$75,000 that are being waived and are actually waiving without standing, nor any prior, nor written consent written by the Plaintiff. From our point of view, federal courts must abide by their virtually unflagging obligation to exercise their lawful jurisdiction and resolve the matters properly before them, Colo. River Water Conservation Dist. v. U.S., 424 U.S. 800 (1976).

15. In this case, that "Federal Question" related to this "priority debt" is the exact "Federal Question" solved within this federal court system, under bankruptcy cases. Is a trustee or a creditor somehow more deserving or somehow different from this non-offending mommy or Plaintiff, when it comes from protecting her from fraud related to this payment? We are 100% sure that the state officers listed as defendants have absolutely no standing, nor legal authority, to waive, WITHOUT EVIDENCE, non-waivable arrears, reason why we find it extremely pertinent for them to become personally liable and responsible of reimbursing the more than \$75,000 of debt that is currently owed to and by A.S.U.M.E., to the Plaintiff.
16. In this case, we are now publicly and respectfully denouncing and requesting for the defendants to abide by federal law codified under Title 42, The Public Health and Welfare § 666 (a) (10) (B). From our point of view, the defendants are now responsible of reimbursing the money owed to the Plaintiff, for failing to obey the federal law cited above.

MALPRACTICE AND DEFAMATION³

17. On the other hand, this complaint also requests for a judicial system to correct all the ramifications stemming from the above referenced and unethical motive, a controversy that puts

³Federal courts may hear tort actions involving child abuse, Ankenbrandt v. Richards, 504 U.S. 689 (1992).

the Plaintiff squarely against defendant O.C.A.. **NO WONDER STATE COURTS HAVE PERMANENTLY BARRED US FROM AUTHENTICATING ETHICAL EXPERT REPORTS, HAVE PERMANENTLY BARRED US FROM VENTING OUR OWN EXPERT EVIDENCE, NOR HAVE EVER GIVEN US OUR TRUTHFUL D.P.L. SPACE TO SIT OUR EXPERT WITNESS, DR. CAROL ROMEY!** All of it in clear violation of the *FUNDAMENTALLY FAIR PROCEDURES STANDARD* imposed since 1982, by Santosky v. Kramer, 455 U.S. 745 (1982).

18. In our quest to begin the process of setting aside 100% of ALL prior decisions related to the defendant's fraud, we truly believe we must request for all federal courts to demand all officers, including defendant Torres-Suria and defendant López Prieto, from inducing and provoking the unethical practice of copying and pasting false allegations, and all written misrepresentations and generalizations, specially the ones that are STILL not substantiated with ANY evidence today.
19. The copied and pasted allegations regarding the Plaintiff, that are related to this complaint, were fabricated by fraud upon the court, which in essence, are NOT decisions at all, which in turn, NEVER EVER became, nor become, final. On this regard, the law is clear:⁴

⁴"...Our Supreme Court has determined that rulings on maintenance and custody **ARE NOT** Res Judicata. Santana Medrano v. Acevedo Osorio, 116 D.P.R. 298, 301 (1985). Because these decisions are not strictly final nor firm, they can be modified

"There is no statute of limitations for bringing a fraud upon the court claim. Hazel-Atlas, 322 U.S. at 244. As a circuit court has explained, a decision produced by fraud on the court is not in essence a decision at all and never becomes final." Kenner v. Comm'r of Internal Revenue, 387 F.2d 689, 691 (7th Cir. 1968).

20. The Plaintiff reiterates that whatever was previously decided, must not conceal, nor suppress the other half, of other set of "less important winners" that have been omitted from everything that is wrongly and publically disseminated:

- a. the Plaintiff was the winner, back in **June 5th, 2009**, when Hon.Judge Ladi Buono returned A.B.O. to her ONLY KNOWN home, to her non-offending mommy.
- b. the Plaintiff was the winner, back in **May 9, 2012** when, AGAIN, A.B.O. was returned to the Plaintiff.
- c. the Plaintiff was the winner back in **June 22, 2012**, when the Appeals Court reestablished protection orders, in

if a change occurs in the facts and circumstances that justify it. Figueroa v. Del Rosario, 147 D.P.R. 121, 129 (1998). Now, in Figueroa v. Del Rosario, *supra*, it was determined that an opinion modifying alimony or varying a custody determination constitutes a sentence from which it can be appealed. Recently this norm was reiterated in Cortés Pagán v. González Colón, 184 D.P.R. 807 (2012), where our Supreme Court stated that "due to the *sui generis* nature of family lawsuits, the rulings issued by the Court of First Instance regarding maintenance and custody, which modify or attempt to modify any previous final determination in this regard, because a change in circumstances has occurred, they are properly sentences that can be appealed." (Emphasis supplied)...", Rosario v. Nieves, 2013 WL 6199541.

favor of the appearing Plaintiff and against three members of the paternal side of A.B.O.'s family.

21. How much additional time will it take for someone other than the Plaintiff, to re-start writing the truth as it really was from **2009-2012** and how it really is, now in **2018**? Concealing, suppressing and not addressing the real "child support battle" underneath the fraud and defamation fabricated by defendants Torres-Suria and López Prieto, has nothing to do with justice.
22. This real motive stated in this lawsuit to collect money, MAKES all of what defendants will attempt to sell, under this federal case, INVALID. No state court, that we know of, has ever dealt with any tiny piece of our injuries. Not even when it comes to A.B.O.'s brand new epilepsy! The illogical demand of making us file a federal complaint, or any complaint for damages, before recognizing any injury, does not make sense.
23. Article 1802 of the Puerto Rico Civil Code, provides for any Plaintiff, with a cause of action to recover damages for injuries suffered due to noncompliance with 31 L.P.R.A. § 5141. Injuries, cannot occur before the above reference defendants perpetrate them, nor before a victim gets to recognize them, with each one of its ramifications. In terms of making the court review, and reject the actions stemming from a previous judgment, How else would federal judges take

innocent people out of jail? How else does anyone correct errors and fraud?

24. As far as we know, neither one of the defendants, have ever been a party to any state court proceeding that we know of, which in no way bar this action. There is nothing, that we know of, that currently bars or prevents the Plaintiff to independently claim what she is claiming today, Casa Marie, Inc. v. Superior Court of Puerto Rico, 752 F. Supp. 1152 (1990). Article 1204 of the Civil Code of Puerto Rico, 31 L.P.R.A. § 3343, in regards to the local res judicata provision, requires the "*most perfect identity of things, causes, and parties, for res judicata effect to apply*", Futura Development Corp., v. Entex Corp., 761 F.2s 33 (1st Cir.). In this case, the parties in the matter before us are different from any lawsuit we have filed prior to the filing of this complaint, and the interests at stake are clearly different from anything we have filed in court before.
25. In addition, Puerto Rico res judicata doctrine contains an "ends of justice" exception which allows a court to refuse to bar an action on the grounds of res judicata, where to do so would work a substantial injustice, Casa Marie, 752 F. Supp at 1163.
26. From our point of view, we will not rest until our point comes across:

- a. there is no identical issue to the one we present today, that was ever determined by any prior final judgment that we know of,
- b. there is not one prior "judgment", that we know of, not even remotely similar to the one we request with this current complaint.
- c. there is nothing similar, from any prior cause of action that we know of, related to any of the above listed defendants.

27. On the other hand, and with all due respect, Who in its right mind can really sustain that this non-offending mommy, had a FAIR opportunity AND INCENTIVE TO LITIGATE ANY issue, prior to filing this **2018**'s complaint? **AGAIN, THE PLAINTIFF HAS BEEN PERMANENTLY BARRED, SINCE 2012, FROM REBUTTING AND VENTING ANY EXPERT OPINION, WITH HER OWN EXPERT.**

28. Whenever a law or a ruling comes along, violating the U.S. Constitution, it can be presumed to be unacceptable. The Founding fathers were well aware that the natural human tendency is for a ruler to grab maximum power. So, using Montesquieu's device of "checks and balances," they designated each of the three branches of government to act as a brake on the power of the other two.

29. Article III of the Constitution of 1787, set the judiciary's powers as:

"Article III of the Constitution: Section 1. The judicial Power of the U.S. shall be vested in one supreme court, and in such inferior courts as the congress may from time to time ordain and establish. The judges, both of the supreme and inferior courts, shall hold their offices during good behavior, and shall, at stated times, receive for their services, a compensation, which shall not be diminished during their continuance in office. Section 2. The judicial power shall extend to all cases, in law and equity, arising under this constitution, the laws of the U.S. and Treaties made, or which shall be made...", Art. III, U.S. Constitution.

30. Once again, this case is about the most important human being in this world to me: my 11-year-old little girl. It is also about the devastating impact this loss has over the Plaintiff and over all of her immediate family members, including A.B.O.. Whatever any Honorable Court assumed or assumes it was or it is correct about the Plaintiff or her little girl, from prior rulings, IS NOT CORRECT AND IT DEFINITELY DOES NOT AND IT DID NOT BECOME FINAL⁵. How else would Atty.Alcides

⁵As we have submitted under oath for an entire decade, the correct order of events and facts, where changed with fraud and the defendants' fabrications, ended up being copied and pasted by Hon. Judge Salvador Casellas, as well as by all mislead forums, which should have included corrections such as: "... On **December 1, 2011**, the defendant reported Ortiz, in WRITING, sexualized behavior. On **January 12, 2011**, López Prieto requested the same as on **May 10, 2010** (joint custody). On **February 9, 2011**, he requested the same (joint custody). On **March 18, 2011**, López Prieto withdrew her request for joint custody and requested full custody for the second time. On **April 28, 2011**, López Prieto repeated the same (requested full custody, for the third time). On **June 1, 2011**, López Prieto repeated the same (requested full custody for the fourth time). On **August 16, 2011** she repeated the same (requested full custody for the 5th time)...she accused Mr.Ulises Ortiz-Sánchez, IN WRITING, of "grooming" ... brother ...who ... suffers severe mental retardation...".

Oquendo, and an entire ethics board composed with the most prominent attorneys available in Puerto Rico integrated by the most prominent physicians, psychiatrists and a variety of doctors, would have allowed me to become a member of this Honorable Court in **2013**? Whatever was fabricated after removal date of **August 7, 2012**, was and remains inadmissible and tampered.

31. The only reason we decided to complete our law studies and practice during **2018**'s Labor Day, in spite the demoralizing examples personally witnessed throughout this ordeal, is our true love for our little girl A.B.O., and nothing else. Meanwhile, while we get A.B.O. back home, we have no choice, but to file this.
32. The courts have a sacred duty to prevent anything fraudulent from hampering its work. So if any officer of the court does something that precludes justice, this must and can nullify whatever has been wrongly solved. All courts must undo what it has been done to my little girl because fraud and law do not dwell together. This document is part of a permanent crusade for all courts to undo, under 28 U.S.C. § 1651, all the mistakes related to fraud upon the court. To achieve it, we must equip ourselves with indispensable tools that include

discovery and getting our own copy of A.B.O.'s entire health folders.

"(a) *The Supreme Court and all courts established by Act of Congress may issue all writs necessary or appropriate in aid of their respective jurisdictions and agreeable to the usages and principles of law.*

(b) *An alternative writ or rule nisi may be issued by a justice or judge of a court which has jurisdiction. (June 25, 1948, Ch. 646, 62 Stat. 944; May 24, 1949, Ch. 139, §90, 63 Stat. 102.)", 28 U.S.C. § 1651.*

33. The law cannot fail in dispensing justice and the legal profession must live up to that. As disgraceful as it may seem from the outside, the law, specially when it comes to the one promulgated by the district court of Puerto Rico, must assist children, period.

"Non-offending mothers' have the right to care for their own biological children, which is their most important right, probably valued above freedom and life itself. These rights are protected under privacy clauses created by the First, Fourth, Fifth, Eighth, Ninth and Fourteenth Amendment, etc. of the U.S. Constitution. To compare these fundamental rights, with any un-animated property right, has nothing to do with justice..." (U.S. Cert.15-1547, U.S. Supreme Court submitted by the Plaintiff, 2015).

"there is a ... fundamental liberty interest of natural parents in the care...of their child does not evaporate simply because they have not been model parents or have lost temporary custody of their child to the State. Even when blood relationships are strained, parents retain a vital interest in the irretrievable destruction of their family life. If anything, persons faced with forced dissolution of their parental rights have a more critical NEED FOR PROCEDURAL PROTECTIONS than do those resisting state intervention into ongoing family affairs. When the State moves to destroy weakened familial bonds, IT MUST

*PROVIDE THE PARENTS WITH FUNDAMENTALLY FAIR PROCEDURES",
Santosky v. Kramer, 455 U.S. 745 (1982). "*

34. For once, contradictory allegations fabricated by charlatans such as defendants María Torres-Suria and Ana López Prieto, must not be listened to, in spite of rubber stamps. Tampering in the administration of justice in the manner we can demonstrate in front of a Jury, involves far more than an injury to a single litigant. It is a wrong against the institutions set up to protect and safeguard the public. Institutions in which fraud cannot complacently be tolerated in order to be consistent with the good order of society.

"Every court must be presumed to exercise those powers belonging to it, which are necessary for the promotion of public justice, and we do not doubt, that this court possesses the power to reinstate any cause, dismissed by mistake. Naturally the judiciary must refrain from engaging in fraud. Current judicial behavior is pretty embarrassing and many courts in the U.S. accept, without question, the rotten tactics that have been used during preparation of a case. Prosecutors often load the charges ...in order to push the accused into attempting a "plea bargain"...a judge can also mock the spirit of the law by dismissing cases "on a technicality", Fraud Upon The Court, Mary Maxwell (2015).

35. In Bulloch v. United States, 763 F.2d 1115(1985), the Tenth Circuit said: "Fraud upon the court is fraud which is directed to the judicial machinery itself and is not fraud between the parties or perjury...It is where the court or a member is corrupted...or where the judge has not performed his

judicial function, thus where the impartial functions of the court have been directly corrupted."

36. In Kenner v. CIR, 445 F.2d 19 (7th Cir. 1971), the Seventh Circuit Court said: "A decision produced by fraud upon the court is not in essence a decision at all, and never becomes final." Keep in mind that at some other point in time, separate from this lawsuit, after this Honorable Court have allowed us to get all we need through discovery, we would then ask for all baseless defamation to be set aside.
37. From our point of view, if there is no other way to get around today's blockage in the courts within Puerto Rico, all people may have to take the law into their own hands. This lawsuit is part of the restoration of sensible law.
38. Just as in 1944 the Supreme Court of the United States explained why fraud upon the court must not be tolerated. Tampering, like the one we can prove in front of a Jury, perpetrated in between and by defendant Torres Suria and defendant López Prieto, against the proper administration of justice, just like it just happened with indicted defendant Paul Manafort, hurts A.B.O., which in turn, hurts the Plaintiff and her entire immediate maternal family⁶.

⁶"...Manafort and an associate, the former Russian intelligence operative Konstantin Kilimnik, were indicted last week on charges of obstruction of justice and conspiracy to obstruct justice based on accusations they tried to tamper with witness testimony...", Manafort is accused of trying to tamper

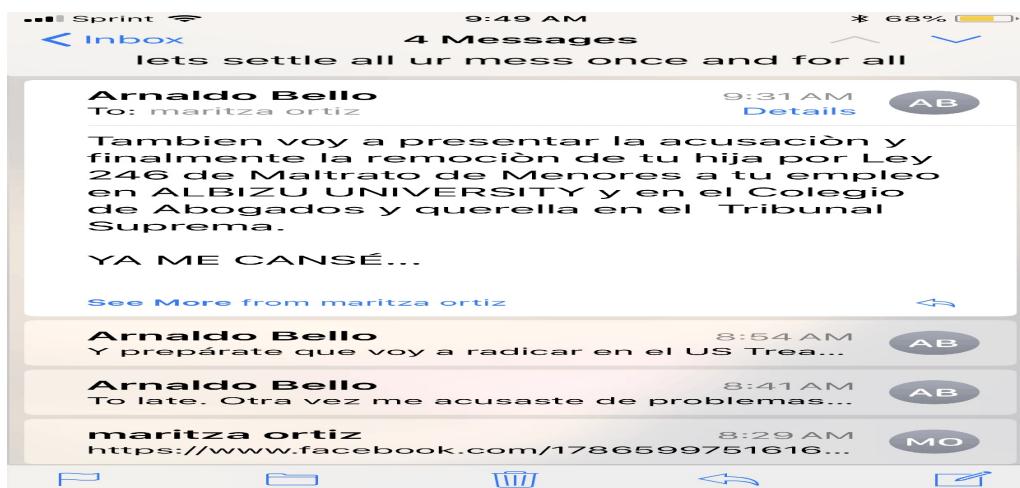
39. Puerto Rico is not the exception to what it's been happening throughout Washington D.C. or since the 1940's, even at times when one-sided and baseless allegations keep damaging our reputation and are being published, with inaccurate or nonexistent evidence, misquoted or nonexistent recordings or inaccurate or misquoted translations.⁷

40. Decorating or copying and pasting fraud, recklessly, is easy. Reviewing, itemizing, evaluating and going through every little libelous fragment or misrepresentation fabricated about the Plaintiff, while complying with the U.S. Supreme Court's standard of rigorously fair procedures, is exactly what was never given to the Plaintiff, and is exactly what is owed to her, and to her little girl A.B.O., today.

WHEREFORE,

with, Business Insider, [https://www.businessinsider.com/mueller-reveals-names-of-witnesses-paul-manafort-tried-to-tamper-with-2018-6 \(June 13, 2018\)](https://www.businessinsider.com/mueller-reveals-names-of-witnesses-paul-manafort-tried-to-tamper-with-2018-6).

7



- a. Plaintiff respectfully requests for this Honorable Court NOT to dismiss our complaint.
- b. Approve our Affidavit to Litigate in Forma Pauperis, submitted the day we filed this complaint (under case #18-CV-01586), so that our filing fee is return to us, as soon as our application gets approved.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this **3rd day of September 2018.**

Plaintiff's Counsel:

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